

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, )

Plaintiff, )

v. )

GALLEON MANAGEMENT, L.P., et, al. )

Defendants. )

09 Civ. 8811 (JSR)

ECF CASE

JURY TRIAL DEMANDED

**DEFENDANT ALI T. FAR'S ANSWER TO THE AMENDED COMPLAINT**

Defendant Ali T. Far ("Far"), by and through his undersigned counsel, for his Answer to the Amended Complaint (the "Complaint"), hereby responds to the allegations of the Complaint as follows. This Answer employs the same section headings and titles as the Complaint, but Far does so only for convenience's sake, and does not admit or concede the accuracy or truthfulness of any of the headings or titles in the Complaint.

**SUMMARY**

1. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.
2. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.
3. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.
4. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

5. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**DEFENDANTS**

6. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

7. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

8. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

9. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

10. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

11. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

12. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

13. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

14. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

15. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

16. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

17. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

18. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

19. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

20. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

21. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

22. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

23. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

24. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

25. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

26. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

### **RELEVANT ENTITIES**

27. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

28. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

29. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

30. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

31. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

32. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

33. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

34. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

35. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

36. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

37. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

38. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

39. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

40. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

41. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

42. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

43. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**a. Polycom's Q4 2005 Earnings Release – January 25, 2006**

44. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

45. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

46. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

47. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

48. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

49. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**II. Polycom's Q1 2006 Earnings Release**

50. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

51. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

52. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

53. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**B. Insider Trading in Hilton Securities**

54. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

55. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

56. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

57. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

58. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

59. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

60. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

61. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

62. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

63. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

64. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

65. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**C. Insider Trading in Google Securities**

66. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

67. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

68. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

69. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

70. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

71. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

72. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

73. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

74. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

75. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

76. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

77. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**D. Insider Trading in Kronos Securities**

78. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

79. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

80. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.



81. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

82. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

83. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

84. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

85. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

86. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

87. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

88. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

89. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

90. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**E. Insider Trading in Intel Securities**

91. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**(a) Intel's Q4 2006 Earnings Release – January 16, 2007**

92. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

93. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

94. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

95. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

96. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**II. Intel's Q1 2007 Earnings Release – April 17, 2007**

97. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

98. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

99. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

100. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

101. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**III. Intel's Q3 2007 Earnings Release – October 16, 2007**

102. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

103. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**F. Insider Trading in Clearwire Securities**

104. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

105. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

106. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

107. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

108. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

109. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

110. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

111. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**G. Insider Trading in PeopleSupport Securities**

112. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

113. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

114. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

115. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

116. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**H. Insider Trading in Akamai Securities**

117. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

118. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

119. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

120. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

121. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

122. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**I. Insider Trading in SUN Securities**

123. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

124. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

125. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

126. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

127. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

128. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

129. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**J. Insider Trading in AMD Securities**

130. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

131. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

132. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

133. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

134. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

135. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

136. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

137. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

138. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

139. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

140. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

141. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

142. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

143. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**K. Insider Trading in IBM Securities**

144. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

145. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

146. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

147. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

148. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

**L. Insider Trading in Atheros Securities**

149. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

150. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

151. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

152. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

153. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

### **CLAIMS FOR RELIEF**

#### **CLAIM I**

#### **Violations of Section 10(b) of the Exchange Act and Rule 10b-5 Thereunder (Against All Defendants)**

154. Far repeats and realleges each and every response in paragraphs 1 to 153 as if fully set forth herein.

155. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

156. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

157. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

158. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

159. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

160. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

161. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

162. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.



163. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

164. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

## **CLAIM II**

**Violations of Section 17(a) of the Securities Act  
(Against Galleon, Rajaratnam, Goel, Chiesi, Kurland, New Castle, Khan, Far, Lee, Far & Lee, Spherix Capital, Hariri, Shankar, Schottenfeld, Fortuna and S2 Capital)**

165. Far repeats and realleges every response in paragraphs 1 to 164 as if fully set forth herein.

166. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

167. On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to Answer.

## **RELIEF SOUGHT**

On the advice of counsel Far invokes his rights under the Fifth Amendment and declines to respond to the relief sought.

Respectfully submitted,

KOBRE & KIM LLP

A handwritten signature in black ink, appearing to read "Steven G. Kobre", is written over a horizontal line.

Steven G. Kobre  
([steven.kobre@kobrekim.com](mailto:steven.kobre@kobrekim.com))

Andrew C. Lourie  
([andrew.lourie@kobrekim.com](mailto:andrew.lourie@kobrekim.com))

Francisco J. Navarro  
([francisco.navarro@kobrekim.com](mailto:francisco.navarro@kobrekim.com))

800 Third Avenue  
New York, NY 10022  
(212) 488-1200

Dated: December 17, 2009

*Attorneys for Defendant Ali T. Far*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served by causing a copy to be filed via the Court's CM/ECF system this 24<sup>th</sup> day of November 2009 on:

**Valerie A. Szczepanik**  
**David Rosenfeld**  
**Israel E. Friedman**  
**Sanjay Wadhwa**  
**Jason Evan Friedman**  
Securities & Exchange Commission  
New York Regional Office  
3 World Financial Center, Suite 400  
New York, NY 10281  
(212) 336-0175

*Attorneys for Plaintiff*

**Adam Selim Hakki**  
**Stephen Robert Fishbein**  
**John A. Nathanson**  
Shearman & Sterling LLP  
599 Lexington Avenue  
New York, NY 10022  
(212) 848-4924  
ahakki@shearman.com  
sfishbein@shearman.com  
john.nathanson@shearman.com

*Attorneys for Galleon Management, LP*

**Norman A. Bloch**  
**Sunny Hyo Seon Kim**  
Thompson Hine, LLP  
335 Madison Avenue  
New York, NY 10017  
(212)908-3942  
norman.bloch@thompsonshine.com

*Attorney for Rajiv Goel*

**Eugene Marie Cesar-Fabian**  
**Kenneth Ian Schacter**  
**Gerald J. Russello**

**Robert Morvillo**  
**Gregory Morvillo**  
Morvillo, Abramowitz, Grand, Iason, Anello &  
Bohrer, P.C.  
565 Fifth Avenue  
New York, NY 10017  
(212) 880-9400  
rmorvillo@maglaw.com  
gmorvillo@maglaw.com

*Attorneys for Anil Kumar*

**Alan Robert Kaufman**  
**David I. Zalman**  
**Thomas B. Kinzler**  
Kelley Drye & Warren, LLP  
101 Park Avenue  
New York, NY 10178  
(212)661-0040  
akaufman@kelleydrye.com  
dzalman@kelleydrye.com  
tkinzler@kelleydrye.com

*Attorneys for Danielle Chiesi*

**Theodore Altman**  
DLA Piper LLP  
1251 Avenue of the Americas, 27<sup>th</sup> Floor  
New York, NY 10020  
(212)335-4560  
theodore.altman@dlapiper.com

*Attorney for Mark Kurland*

**Laura A. Brevetti**  
K&L Gates LLP  
599 Lexington Avenue

Bingham McCutchen LLP  
399 Park Avenue  
New York, NY 10022  
(212)299-6235  
eugenie.cesar-fabian@bingham.com  
kenneth.schacter@bingham.com  
gerald.russello@bingham.com

*Attorneys for Robert Moffat*

**Steven Ronald Glaser**  
Skadden Arps, Slate, Meagher & Flom LLP  
Four Times Square, 42<sup>nd</sup> Floor  
New York, NY 10036  
(212)735-2465  
steven.glaser@skadden.com

*Attorney for New Castle Funds, LLP*

**Robert H. Hotz, Jr.**  
**Samidh J. Guha**  
Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
New York, NY 10036  
(212)872-1000

*Attorneys for Raj Rajaratnam*

**Kenneth M. Breen**  
Fulbright & Jaworski, LLP  
666 Fifth Avenue  
New York, NY 10103  
(212)318-3340  
kbreen@fulbright.com

*Attorneys for Schottenfeld Group, LLC*

Dated: December 17, 2009  
New York, New York

New York, NY 10022  
(212)536-3901  
laura.brevetti@klgates.com

*Attorney for Choo-Beng Lee*

**Harlan J. Protass**  
Law Offices of Sean F. O'Shea  
90 Park Avenue, 20<sup>th</sup> Floor  
New York, NY 10016  
(212)682-4437  
hprotass@protasslaw.com

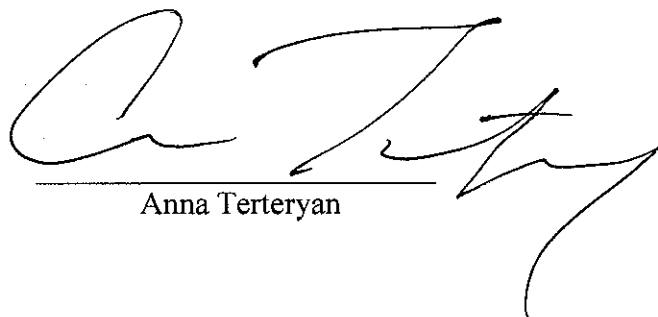
*Attorney for Ali Hariri*

**Richard J. Schaeffer**  
Dornbush Schaeffer Strongin & Venaglia, LLP  
747 Third Avenue  
New York, NY 10017  
schaeffer@dssvllaw.com

*Attorney for Steven Fortuna*

**Hissan Ahsan Bajwa**  
Paul, Hastings, Janofsky & Walker, LLP  
75 East 55<sup>th</sup> Street  
New York, NY 10022  
(212)318-6000  
hissanbajwa@paulhastings.com

*Attorneys for Schottenfeld Group, LLC*



Anna Terteryan